



The Metlakatla Peninsula Cleanup Partnership

A Case Study

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*Towards an Environmental Justice Collaborative Model: Case
Studies of Six Partnerships Used to Address Environmental
Justice Issues in Communities (EPA/100-R-03-002)*

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Metlakatla Peninsula Cleanup Partnership

We are struggling with past relationships and trust issues. As long as we move as a group with no one individual making decisions we're ok.

Between feds -we have varying interpretations of what [standards] the site should be cleaned up to... This makes [cleanup] difficult.

The [Partnership] saves everyone time and facilitates the overall cleanup. Saves everyone time, especially for the Tribe. Could be a huge value for them in the end.

Knowing people at the other agencies has been a tremendous help. You get to know people in the other agencies, and you start to look to them for other project partnerships dealing with other issues.

— Interviewees, Metlakatla Partnership

Community History¹

Annette Island is located on the southern tip of a chain of islands in southeast Alaska and covers approximately 200 square miles. Mild winters, cool summers and heavy rainfall, along with both flat and mountainous terrain, forest, lakes, bogs, coastal beaches and rocky shoreline, characterize the island. Annette supports a range of fish and wildlife, including wolves, deer, three species of salmon, and American Bald Eagle. In addition, humpback whales typically migrate alongside Annette's shorelines.¹

In 1887, William Duncan, an Anglican missionary based in British Columbia, secured rights to an Alaskan island for himself and a small band of Tsimshians Indians followers after fundamental disagreements with church officials and a growing loss of control over Tsimshian territory to government officials and non-natives.² Mr. Duncan, along with 700 Tsimshians then left their home in Metlakatla, British Columbia and traveled 100 miles to Annette Island.³ The Tsimshians established New Metlakatla on the northern tip of a major peninsula in the island's southwest region. Four years later, Congress formally established this and nearby surrounding islands as a permanent reserve for the Tsimshians.⁴ In New Metlakatla, "the Community created for itself a life that combined the old with the new."⁵ Residents built a church, sawmill, fish cannery, community hall, guesthouse, and Victorian-style houses connected by boardwalks.⁶ They also re-established the native council⁷ and continued subsistence patterns of fishing and gathering.⁸

At the onset of World War II, the U.S. government recognized the strategic importance of Annette Island's location and leased 12,000 acres six miles south of Metlakatla from the Metlakatla Indian Community (MIC) in order to build an Army Air Force base and small Navy base. Several federal agencies assisted in the development of over 700 buildings that

¹ Interviews for this case study were conducted between November 29, 2001 and April 4, 2002. Eight separate interviews were conducted and a total of ten persons participated. Interviews were conducted with the tribal environmental coordinator, an environmental consultant for the tribe, and representatives of six different federal agencies. Interviews with federal agencies included representatives from both headquarters and field level staff based in Alaska, and the Bureau of Indian Affairs, which serves as the federal steward for tribal lands.

eventually supported roughly 7,000 troops.⁹ At the war's conclusion the facilities quickly emptied;¹⁰ however, soon afterward the federal government once again began using a portion of the facilities. In 1948, the Federal Aviation Administration (FAA), and later the U.S. Coast Guard (USCG) leased the airfield which served as the airport for Ketchikan,¹¹ a nearby Alaskan city.

New construction in the 1940s resulted in “runways, taxi routes, hangars, storage tanks and facilities, housing, docks, a hospital, and infrastructure improvements to water, sewage, and communications” and, until that time, was the only development on the peninsula outside of Metlakatla.¹² Federal involvement on the island was important for the Metlakatla economy¹³ and brought a limited number of well-paying employment opportunities for local residents.¹⁴ However, such benefits diminished with the cessation of most federal activity by the mid-1970s. When a new airport opened in Ketchikan in 1974, FAA transferred most of the airfield and equipment to the MIC.¹⁵ Metlakatla residents made use of several former FAA housing structures for forestry offices. Further, community members developed a small sawmill inside the hangar as well as a mill machinery maintenance shop in another building nearby. However, most of the sites went unused.¹⁶ To support itself, the MIC continued to primarily rely upon its commercial fishing and timber harvesting operations.

Today the MIC consists of roughly 1,400 residents.¹⁷ The median income for Metlakatla families in 1990 was over \$38,000 and unemployment was 13 percent.¹⁸ However, by 2000, unemployment had risen above 80 percent, as many residents lost jobs and saw their royalty payments disappear primarily due to federal timber restrictions that began taking effect in the mid-1990s.¹⁹ Even before the restrictions and a disastrous fishing season in 1995,²⁰ however, the Tribe was making plans to diversify its economy and fortify its natural resource base. For instance, the MIC eventually developed plans to construct a water bottling plant, a tribal economic development office, and a rock quarry and engage in several other economic development initiatives.²¹ A primary focus of the Tribe's, however, was the cleanup of the abandoned facilities, debris, and potential contamination primarily leftover at the former airfield site.

Metlakatla Peninsula Cleanup Background

Concerned about the former sites' potential impact on health, local food supply, and the economy, in the early 1990s the Tribe took steps to investigate the former site in more detail. The Tribal Environmental Coordinator, along with the Tribe's contractor, identified over 80 sites with environmental concerns, including “underground and above-ground storage tanks, disposal areas, barrels, explosives, asbestos-containing materials, lead-based paint, and spills.” A summary report later developed noted that, “Environmental contamination presents a risk to residents and workers at the site and to sensitive wetland and coastal environs.”²²

Instead of pursuing a Superfund designation for the Peninsula, the Tribe sought to work cooperatively with the federal agencies that had contributed to past contamination. In January 1995, the MIC sent a formal letter to FAA asking the agency for it to assist in addressing the environmental issues identified by the Tribe.²³ The Bureau of Indian Affairs (BIA), COE², USCG, and FAA responded by conducting an environmental review to assess past government impacts on the island completed in August 1997.²⁴ In the meantime, FAA and COE began

² Under the Department of Defense's Formerly Utilized Defense Sites program, COE is the lead agency for cleaning up sites used by the U.S. Army, Air Force, and Navy (See Federal Aviation Administration, *Annette Island Environmental Restoration Issues*, p. ES-1).

working on a Coordinated Comprehensive Cleanup (C3) Plan to better coordinate cleanup efforts by the federal agencies and make effective use of resources.²⁵ MIC's contractor, in cooperation with the Tribe, also developed a master plan describing resources required for cleanup and how MIC members could be hired to support cleanup activities²⁶. By July 1999, several agencies, either formally or informally, had signed a Memorandum of Understanding (MOU), along with the MIC, to ensure cleanup cooperation.²⁷ Today, the MOU Work Group consists primarily of field-level representatives from FAA, COE, the MIC's environmental coordinator, and the contractors for each organization.³

MOU Work Group

It is useful to think of the MOU Work Group's activities as roughly falling into three main categories: (1) administrative, (2) environmental, and (3) community involvement and outreach. In reference to the first, the MOU Work Group, as well as individual members, engage in several activities to enhance cooperation and coordination. First, the MOU Work Group hosts bi-weekly teleconference calls guided by a strict agenda where the members discuss "issues associated with accomplishing the cleanup work, including MIC priorities, technical approaches, regulatory requirements, sharing of data, coordinated scheduling of work activities, and community outreach."²⁸ Meeting minutes as well as numerous other cleanup-related documents are posted on an Annette Island cleanup site sponsored by FAA. Second, the MOU Work Group has developed several additional tools, including a quality assurance program plan, to expedite cleanup work.²⁹ Third, COE and FAA (and USCG to a more limited extent) also share resources to enhance efficiency of the cleanup effort. For instance, COE and FAA shared office space, exchanged personnel, and used a single engineering firm. By collaborating on these activities, as well as community involvement efforts that will be discussed in detail below, FAA estimates that the federal agencies involved saved over \$750,000 from 1999 through 2001.³⁰

Regarding environmental activities, agencies involved in the MOU Work Group have made concerted efforts to cleanup all single party sites, although the MIC has yet to issue a "closed" status for any. Further, FAA and COE have teamed up to address two-party contaminated sites involving FAA and a DOD-led agency. Once money becomes available, and allocation responsibilities have been identified, the responsible agencies will move to cleanup these more complex sites. A list of specific environmental accomplishments from October 1999, through October 2000, is listed in the table below.³¹

³ BIA is an original MOU signatory but is not a regular participant in MOU Work Group activities. USCG signed on to the MOU Work Group as an informal member. Since 2001 the agency has not participated with the MOU Work Group, although it is still involved in limited cleanup activities on the island.

Environmental Accomplishments of MOU Work Group Members and USCG October 1999 through October 2000	
BIA	
▪	Eight contaminated buildings and pads dismantled and disposed
▪	Scrap metal removed in conjunction with FAA
COE	
▪	10,000 feet of former fuel line drained and cleaned
▪	7,000 gallons of fuel/water mixture removed
▪	Additional mercury-impacted soil removed at one site
FAA	
▪	Debris removed from 30 sites
▪	53 sites investigated to determine extent of contaminants possibly released into environment
▪	45 abandoned towers with lead-based paint demolished and recycled
▪	800 abandoned drums removed and recycled off the island
▪	14 underground one aboveground fuel storage tanks decommissioned and disposed of off island
▪	700 tons of scrap metal removed from island
USCG	
▪	Process for removal of three storage tanks begun

Figure 1. Environmental Accomplishments of MOU Work Group Members and USCG October 1999 through October 2000

Community involvement and outreach activities of the MOU Work Group members include consultation and outreach, actively hiring local MIC residents, and Work Group team building. Regarding this first activity, members of the MOU Work Group provide briefings to the Tribal Council approximately once per year. MOU Work Group members have also conducted several community outreach activities, including participating at the Tribe's yearly Founder's Day celebration and community health fair. Members of the MOU Work Group have also actively sought to hire MIC residents to conduct cleanup activities, a critical objective of the MIC. For instance, COE hired seven local residents (50 percent of total field workforce) in 2000.³² In addition, MOU Work Group members, and most noticeably FAA, have been actively pushing for enhanced teamwork between members. Recently this desire culminated in a rigorous one-week team building exercise held in Ketchikan, Alaska in March 2002, paid for by FAA.

Although the MOU Work Group experienced some successes in coordinating and initiating cleanup actions on several sites, according to an FAA document, cleanup efforts have been hampered for several reasons, including lack of full coordination across MOU Work Group members, insufficient funding, varying agency environmental policies, and lack of single overall lead agency.³³

Partnership Background and Goals

Recognizing the need for additional assistance and an opportunity, in early 2000, an agency official within the Department of Defense (DOD), based near Washington, D.C., developed a proposal for the cleanup work at Annette Island to be accepted as a federal Interagency Working Group on Environmental Justice national demonstration project. The DOD official hoped that this national designation would enable enhanced coordination of agency officials at the Headquarters level, and, in turn, enable parties involved directly in the cleanup to

identify, assess, and remediate contaminated sites more efficiently. The MIC agreed to this approach, recognizing that such a designation would help better ensure that cleanup work on the island would be completed. In June 2000, the proposal was accepted, and, soon after, the Environmental Justice (EJ) Work Group was formed, consisting primarily of agency headquarters officials from FAA, COE, USCG, BIA, as well as EPA. The MIC is also a member, however, issues involving distance and coordination has limited the MIC's involvement. The EJ Work Group and the MOU Work Group do not regularly hold formal meetings together; however, loose coordination exists between the two.

Although not well defined, it is helpful to visualize the partnership around the issue of island cleanup as consisting of three distinct components: (1) the MIC; (2) the EJ Work Group; and (3) the MOU Work Group. All groups have as a common goal to cleanup the contaminated sites on the island; however, they each have a slightly different focus. The MOU Work Group members are focused primarily on cleaning up sites. The EJ Work Group is focused primarily on facilitating the resolution of difficult cleanup issues; and the MIC, although represented on both work groups, is focused on ensuring that cleanup will take place in a manner that meets the needs and priorities of the Tribe. The Metlakatla Peninsula cleanup partnership is depicted in the graphic below.

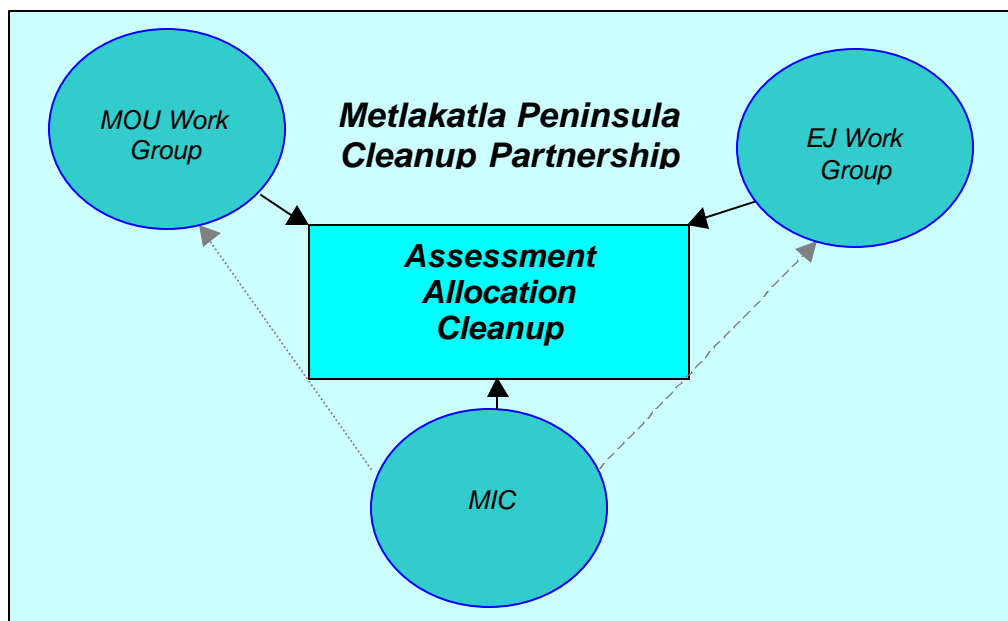


Figure 2. EPA Representation of the Metlakatla Peninsula Cleanup Partnership

In addition, after the MIC was designated as a Brownfields Showcase Community in October 2002, efforts were made by the EJ Work Group, MOU Work Group, and EPA Brownfields officials to ensure that communication lines between the cleanup effort and the Brownfields redevelopment effort would remain open. By integrating cleanup and potential options for reuse at three sites through the cleanup and Brownfields work, the parties hope to better ensure that the cleanup will match the Tribe's desired reuse of the site and potentially make much more efficient use of resources.

On-Going Issues Impeding Cleanup

Despite the EJ Work Group's intention to resolve challenging issues impeding site cleanup, progress in cleaning the more challenging multi-party sites has been slow. Two critical issues are discussed in more detail below.

Allocation of responsibility for cleanup at multi-party sites. The numerous parties involved, the numerous transactions involving property, and insufficient records, complicate allocation. For instance, the MOU Work Group identified 18 parties that may be liable for cleanup costs including nine US federal agencies, two Canadian federal agencies, the State of Alaska, the MIC, and five private companies.³⁴ Closely related are the complicated tasks of determining who should fund cleanup at multi-party sites and then who should be responsible for conducting the remediation.

Determination of what constitutes a "clean" site. Members of the MOU Work Group desire to seek official approval indicating that their site is clean once appropriate remedial action has been taken. This matter is complicated, however, as it is not clear to all parties involved what entity has responsibility to make such a determination, nor what level of cleanup might be considered appropriate. As a sovereign nation that can be delegated authority from the federal government to manage its environmental programs, the MIC has developed, and received approval from EPA for several cleanup standards put forth by the Tribe. However, the Tribe has yet to develop and/or receive approval for standards that correspond to all the contaminants found at the sites.³⁵ Further, the various parties involved in the cleanup often have varying internal guidance recommending that different levels of cleanup should be met.³⁶

FAA-Alaska has been active in putting forth suggestions to resolve remaining issues,³⁷ however, no action was taken in response to these suggestions. Further, most Metlakatla Peninsula Cleanup partners expect that solutions to the remaining issues will need endorsement from the EJ Work Group before moving forward in concert. In an effort to resolve some of the on-going obstacles, the EJ Work Group initiated an alternative dispute resolution process (ADR) in 2001 led by a team from EPA's Conflict Prevention and Resolution Center. In January 2002, the ADR team submitted preliminary recommendations to the EJ Work Group on how to improve the process. This was followed up by a two-day meeting in Seattle held in June that involved the Tribe and members of both the MOU and EJ Work Groups. It is too early to tell the impact the meeting will have on improving the course of cleanup activity on the island.

The following sections primarily describe interviewees' responses to questions gathered from interviews conducted by EPA's Office of Policy, Economics, and Innovation from late November 2001 through late April 2002. The sections focus on interviewees' impressions regarding measuring partnership success, partnership success and challenges, recommendations for improving the partnership, overall value of the partnership, and the value of federal involvement in the partnership. It is important to note that this case study diverges from others in that only two main categories of partners, federal agencies and the MIC, are currently playing a central role alongside the MIC in this partnership effort. Interviewees include the MIC tribal environmental coordinator, the MIC's environmental consultant, BIA, DOD Headquarters, COE-Alaska, FAA-Headquarters, FAA-Alaska, USCG-Alaska, USCG-Headquarters, and EPA-Headquarters. BIA is the federal steward for tribal lands and is perceived as somewhat more closely allied with MIC interests, while EPA is considered to be a neutral party.

Measuring Success

The Metlakatla Partnership does not have a measurement framework to determine success of their effort. However, five interviewees had thoughts regarding what success might look like and how the project should be evaluated. First, two interviewees noted that project success would be indicated by cleanup of the contaminated sites. One added that currently 60-70 cleanup sites had an “open” status, meaning that the Tribe was not in agreement that the sites had been adequately cleaned up. Similarly, another interviewee felt that success would be indicated by a cleanup of the island to a degree that the MIC was comfortable with. Further, she/he added that an additional indicator of success would be a cleanup that took ten years as opposed to twenty to complete. In addition, she/he added that milestones should be used to help gauge project success. Another interviewee suggested that the on-going accumulation of cleanup data should be used to evaluate success. She/he further suggested that periodic checks by a federal representative should be conducted to ensure that cleanup is going as planned. Finally, one of the same interviewees remarked that an evaluation framework is needed, but that no single framework should be required for Interagency Working Group Environmental Justice pilot projects.

Partnership Successes

In terms of greatest overall success, no clear consensus emerged from the interviewees’ responses. Four referenced the coordination of the partnership as its biggest success. Specifically, two cited the coordination between agencies in the field. Another cited more generally the coordination between the federal agencies, noting that the technical communication between them is very well established and the agencies’ engineers are very knowledgeable. This interviewee added that the effective coordination between the federal agencies has resulted from these agencies’ dedication of funding, enthusiastic people, and management support. Along similar lines, another interviewee noted previous cleanup efforts were very sporadic and that mere involvement in this type of project “is a big deal.” She/he went on to say that, “People are pulling together because everyone sees it as something positive for the community.” Related to coordination, two interviewees directly referenced the involvement of certain stakeholders as the partnership’s greatest success. One noted specifically the involvement of DOD’s Len Richeson as critical in leading the EJ demonstration project. Another cited the involvement of (1) federal agencies, particularly those not previously active in working with Tribes (which may have resulted from the EJ Demo pilot designation); (2) a tribal representative who has a leadership role; (3) a strong technical consultant for the Tribe who can act in accordance with tribal values.

Another major success, according to two interviewees was dedication. One interviewee noted that the MOU Work Group’s dedication despite many frustrations was the partnership’s greatest success; while a second emphasized the dedication of the EJ Work Group, which has continued to meet after two years despite many frustrations. She/he added that the group has continued to meet because of their obligations to clean up the sites. Another noted that the greatest success of the effort, thus far, was the agreement by the MOU Work Group members to participate in a rigorous team building session. She/he went on to say that it’s important for the members to talk first about “what makes us tick” and then discuss allocation. Finally, one interviewee stated that the partnership’s greatest success has been the visibility it gained when the cleanup effort was designated as an Environmental Justice national demonstration project. Because of this, according to the interviewee, agencies provided more funding for the effort.

Partnership Challenges

Interviewees voiced several challenges facing the partnership. The most consistently raised challenges centered on issues of trust and communication, allocation, and cleanup standards. First, several interviewees raised concerns over communication and trust issues. Specifically, five cited problematic communication issues between the MIC and federal agencies. Of these, two noted that it appeared that federal agencies did not allow sufficient Tribal input in decisionmaking. One noted that within the EJ Work Group it “seems like they are not letting the community in.” Two remarked that the federal agencies were not given sufficient access to the Tribal Council. One of these explained that the federal agencies only had access to the Tribal Council once per year but additional meetings were needed. She/he went on to explain that the lack of timely meetings can be especially problematic when the agencies want to obtain site “close-out” standards from the Tribe. Also related to communication difficulties, one of the same interviewees stated that the federal agencies did not fully understand their trust responsibilities in relation to the Tribe. In addition, a sixth interviewee stated that the EJ Work Group did not sufficiently communicate with the MOU Work Group. Finally, one interviewee noted that one of the major difficulties has been establishing trusting relationships between all the federal agencies and the Tribe.

Second, four of ten interviewees noted the difficulty of determining cleanup responsibility for the multiparty sites on the island. One remarked that the on-going allocation process has been “really, really challenging.” She/he went on to say that part of this difficulty stems from an inability to set meeting times when all parties can attend. Another interviewee commented that the parties are willing to discuss allocation, but some are becoming frustrated.

Third, four interviewees cited the lack of consensus regarding cleanup standards as a major partnership hurdle. Interviewees voiced concern that the Tribe may have set standards too high in some instances, or that the Tribe’s standards aren’t equivalent to EPA’s or the State of Alaska’s. One interviewee noted that his/her organization is regularly required to cleanup to the most stringent level, but in some instances current technologies do not detect to levels required by MIC standards. Another voiced concern that the Tribe wanted his/her agency to remove certain contaminants to a level beyond background levels. She/he did note, however, that the concerns over cleanup standards were being negotiated one standard at a time.

Other barriers to success cited include: (1) inconsistency between some of the various agency policies and terminology guiding cleanup, such as what is meant by the term “lead agency”; (2) getting reluctant parties to address their contamination cleanup responsibilities; (3) lack of sufficient involvement by EPA Region 10 to help guide the cleanup process; (4) lack of agreed upon contamination testing procedures; (5) lack of appreciation for the need to obtain an allocation agreement for the multi-party sites, especially since most of these, according to the interviewee, are the most contaminated; (6) determining who will actually conduct the cleanups once allocation is determined; (7) consistent lack of funding; (8) disparities in funding availability between parties; (9) ineffective communication about which cleanup issues are top priority; (10) insufficient tribal experience to oversee the cleanup program; (11) addressing Tribal issues not directly related to cleanup, which could confuse the cleanup process; and (12) winter weather, which can slow the cleanup process.

When asked whether the organizational styles and procedures of the different partner organizations limited effective collaboration between partners, of the ten interviewees addressing this topic nine mentioned that some styles and procedures have limited effective collaboration. Of these nine, five cited varying organizational policies regarding site cleanup

standards as problematic. For instance, one remarked that agencies under the Department of Defense are only required to cleanup to approved EPA/State requirements, which could pose a problem if the Tribe wants sites cleaned to a greater degree than EPA standards. Two voiced concern that one agency's cleanup standard is based on risk, another's is based on the most stringent standard approved, while another agency does not have a clear policy regarding this, making it difficult to determine to what extent a site should be cleaned.

Another organizational barrier cited by two interviewees centered on budget/funding issues. One remarked that different budget cycles made collaboration more difficult, while another expressed concern about the inability for some organizations to consistently send their principle people to meetings. She/he added that a centralized travel budget might help alleviate these concerns. This same interviewee also explained that the Tribe's lack of resources for environmental programs made it difficult for the Tribe to respond to issues raised by other members of the MOU Work Group in a timely fashion. Another interviewee explained that his/her organization's policy prevented contracting with the MIC directly to perform cleanup operations, thus limiting the number of MIC residents that could be hired. Another interviewee voiced concern over a historical lack of trust between two partner organizations. She/he added, however, that as long as EPA is seen as neutral, and all the members continue to make decisions in a collective manner, this issue should not pose too great a difficulty. Finally, one interviewee remarked that the federal agencies' inability to always know what the others were doing contributed to project difficulties.

Interviewees' Recommendations for Improving the Partnership

Interviewees provided several different recommendations for improving the effectiveness of the Metlakatla partnership. Three of the nine interviewees addressing this topic recommended completing the allocation process. One advocated bringing together the EJ Work Group members, ADR officials, and Brownfields representatives together in one room to work out all issues associated with allocation. Another emphasized that allocation may only work if a consent order can be applied. Related to the allocation process, one interviewee urged all parties to come together and agree to a consolidated, massive cleanup effort, and then urge Congress to appropriate the necessary funding. Contrasting with this recommendation, two interviewees urged EPA to expand its leadership over the effort, while another urged that one person be put solely in charge of the project who would act as the "information hub."

Other recommendations included: (1) increasing coordination with EPA Region 10; (2) conducting the MOU Work Group team building initiative; (3) ensuring that there is early, substantial communication with the Tribe; (4) dividing the EJ Work Group members into smaller groups to work on MIC priorities once they are fully understood; (5) providing greater follow-up, such as meeting notes, following the EJ Work Group meetings; (6) training the MIC community on ensuring effective communication with federal agencies; (7) ensuring that the MIC has close communication with agency representatives in charge of implementing the ADR process regarding allocation; (8) being realistic about cleanup schedules and funding requirements; and (9) having EPA build a unifying framework to incorporate the many different activities associated with the cleanup effort, including the environmental justice component, Brownfields, and DOD's Native American Lands Environmental Mitigation Program.

Interviewees' Recommendations for Other Communities Using Partnerships

All ten interviewees provided recommendations for other communities using partnerships to address environmental justice issues. The first set centered around structural

and operational considerations of partnerships. Three interviewees suggested using central points of contact/single project leads. For instance, one stated that partnerships need to “assign a lead agency...you need an established authority/decision maker from the beginning of the process.” Two interviewees emphasized that resources be made available to ensure the implementation of the partnership. One specified resources for “pulling the different member organizations together in the collaborative” and another specified the need for administrative support. Another interviewee suggested taking time to understand the local political structure. Finally, one of these same interviewees urged that partnerships set standards about what they intend to accomplish.

The second set centered on themes of openness and inclusiveness. Two interviewees stressed the need for recognizing differences within agencies. For instance one of these stated that when working with agencies “you need to learn differences in agencies, what their processes are, and what their scope is.” Similarly, another interviewee encouraged communities interested in partnerships to “be open and willing to talk.” Finally one interviewee provided several recommendations regarding inclusiveness. She/he stated that when developing a partnership it is important to “identify all the players in a project, include every group even the ones that are not visible. Emphasize participation.” She/he went to say that it is also important to use National Environmental Policy Act (NEPA) and environmental justice guidelines to help guide partnership development. Moreover, the interviewee added that it is important to keep in mind that tribal communities may lack the communication infrastructure (e.g., email, television, and radio) that non-tribal communities have.

Value of Collaborative Partnership

When asked about the value of addressing issues through a collaborative partnership approach, seven of the seven interviewees addressing this topic indicated that collaborating had added value, although one of the interviewees remarked that collaborating had not been as valuable as she/he had hoped. Four interviewees noted that the value of collaborating was the efficiencies gained, such as time and money. One of these stated that by using the same contractor, two agencies have saved between \$600,000 to \$1 million in cleanup expenses alone. Another interviewee stated that the cost savings from collaborating would be most significant for the Tribe, who, because of the partnership, no longer need to work out disagreements with the different federal agencies on a one-to-one basis. She/he noted that these savings for the Tribe could be really enormous by the time the cleanup effort is completed. Related to economic benefits, one interviewee remarked that the partnership has resulted in a large amount of money being injected into the MIC economy. Another explained that the effort has resulted in the professional training of some MIC residents. These same two interviewees explained that the partnership has resulted in some sites being cleaned up, and a greater appreciation by the MIC that the federal agencies are addressing their cleanup responsibilities. Finally, one interviewee explained that “the project fostered a better understanding of involvement and a greater understanding of the different agency views of the project.”

When asked whether the collaborative process could be used to address other issues that the MIC is facing, of the six addressing this topic, four indicated yes, while two were ambiguous in their responses. One who responded with yes remarked that this same type of approach is beginning to be used in the Metlakatla landfill cleanup project.

When asked whether the main issues affecting the MIC would have been addressed without a collaborative approach, of the nine that addressed the question, two indicated

unequivocally that the issues (primarily the cleanup issues) would not have been addressed, one that the issues would not have been addressed unless a court order would have been imposed, and four that some cleanup would have occurred but the effort would not have been as effective. Two gave ambiguous responses. Of those indicating that the cleanup effort would not have been as effective, one stated that without a collaborative approach, FAA would not have been as extensively involved and that COE may have avoided cleanup until later and then, once it began the cleanup, would have simply informed the MIC what it was doing, performed the work and then left, all without (1) making use of local knowledge to enhance the cleanup effort and (2) aiding the local economy by hiring local residents. Two interviewees indicated that the cleanup effort would have taken a lot longer to complete, with one adding that the cleanup would not have been performed to a level that would be satisfactory for the Tribe. In addition, another interviewee stated that sites simply would not have been identified to the extent they would have without the partnership. Of those that were ambiguous, one remarked that it is simply hard to say, while another remarked that every once in a while his/her agency has thoughts about withdrawing from the partnership, but then, according to the interviewee “reality hits home.”

Value of Federal Involvement in Partnership

When asked about the effect of having federal agencies participate in the Metlakatla partnership for the Tribe beyond the immediate issue of federal cleanup responsibility, the five interviewees addressing this topic produced a variety of responses. Two interviewees stated that federal involvement helped improve the Tribe’s understanding of environmental issues, such as environmental contaminants. Similarly, another interviewee stated that federal participation enhanced the Tribe’s appreciation for the role of the regulator in environmental protection. One of these same interviewees also stated that federal involvement resulted in the training of some MIC residents for cleanup activities and improvement of their management skills. Another interviewee explained that federal involvement has boosted the image of the Tribe, heightened attention regarding activities needed to cleanup the island, and enabled the Tribe to more easily gain access to key decision makers. Finally, one interviewee stated that federal involvement has simply been critical to the cleanup work on the island.

When asked what federal partners have gained by participating in the MIC partnership, five of the seven that addressed this topic indicated that federal agencies improved their understanding of tribal issues. For instance, one interviewee stated that, “The agencies have a greater appreciation for federally recognized tribes and a clarification of what it means to be federally recognized.” Another interviewee explained that agencies “have gained the understanding that Indian communities do not think like the rest of the world. The federal agencies now know that they must deal with the cultural and the spiritual identity as well as idiosyncrasies of tribal communication.” Similar to this, another interviewee indicated that federal agencies have gained awareness of the difficulties tribal communities have in dealing with multiple agencies. She/he added that, “We now understand their perspective and realize some of their frustrations when comparing the different requirements of the federal agencies. It has helped us rethink and focus on our communication.” Interviewees also stated that federal agencies have accrued other benefits as a result of their participation, including: (1) a better means of communicating between federal agencies; (2) an improved understanding of environmental issues in Alaska; (3) cost savings for the federal government; (4) lessons learned about the allocation process; and (5) a new model for conducting multi-federal agency cleanups.

When asked whether federal agencies have been able to better coordinate their activities as a result of their involvement in the Metlakatla partnership of the seven interviewees

addressing this topic, three indicated yes, three indicated they weren't sure, and one gave an ambiguous response. Of those indicating yes, one interviewee explained that the partnership had challenged his/her agency's ability to work with public and private organizations, and increased his/her agency's ability to work together, even at the headquarters level. Another interviewee explained that the federal agencies are coordinating better "because they now understand steps to take...[for] a project of this magnitude." For the interviewees indicating possibly, two indicated that each's own agency's ability to collaborate has improved. The other stated that "it is hard to see the influence of this compared to the whole great number of coordinated projects; it is, however, reinforcing the federal collaborative trend."

Interviewees were also asked what federal agencies could do to be more effective partners in local collaborative efforts. Ten of the ten interviewees addressed this topic. Five interviewees emphasized establishing points of contact to help guide the partnership. Of these five, two suggested that single points of contact should be established within each agency, and added that the partnership work must be a priority for them. Two other interviewees recommended that one agency should be made to serve as the overall lead for the partnership. One of these added that participating agencies should establish a common process and a concise set of guidelines to grapple with issues where each agency has its own procedures, such as with NEPA. Another interviewee recommended that the affected community be empowered so that the partnership would be locally controlled and locally sponsored. She/he added that partner members should only look to agency headquarters for support and advice, not to guide the partnership.

Two interviewees provided suggestions specifically for cleanup. One interviewee recommended that participating agencies develop some mechanism for determining cleanup goals and persuading the responsible parties to negotiate cleanup issues. The second interviewee urged EPA to make its cleanup expertise more available to other federal agencies, especially ones not experienced in cleanup issues, although she/he added that regulatory barriers prevented this. The interviewee further explained that if EPA had become involved in helping coordinate cleanup issues earlier in the process, much time and money would have been saved. Finally, one interviewee presented more general recommendations, suggesting that federal agencies should communicate openly with affected communities and take time to explain the everyday activities they are performing.

Key Findings⁴

- The MOU Work Group and the MIC have made significant progress to ensure that the contaminated sites on Annette Island will be remediated, although several issues, including the allocation of cleanup responsibility for multi-party sites and reconciliation of varied perspectives regarding appropriate cleanup standards, will need to be resolved before the sites are cleaned to a level acceptable by all parties.
- The overall cleanup effort could benefit by much more substantive interaction and open communication between the EJ Work Group and the MOU Work Group. The Tribe, a member of both work groups, appears satisfied with its involvement in the MOU Work Group, but desires increased involvement with the EJ Work Group.
- The goals of the MIC and the federal agencies have not been integrated. The Tribe sees federal involvement on the island as an opportunity to address other

⁴ Findings based primarily upon data collected between 11/29/01-4/24/02.

environmental, public health, and economic priorities in addition to contaminated site cleanup; whereas the federal agencies involved in cleanup work are primarily concerned about cleaning up the contaminated sites and don't show signs they are ready to expand this vision. Openly reconciling these two converging viewpoints should help reduce frustrations for all parties in the future.

- Better integrating the goals of the Brownfields effort, the cleanup effort and other similar Annette Island initiatives where clear overlap exists, although challenging, would increase efficiency and reduce frustration regarding cleanup and redevelopment efforts for both the participating federal agencies and the Tribe.
- Efforts by the MOU Work Group to openly communicate, establish common procedures, and share resources have resulted in tangible benefits for all the parties involved, including an estimated cost savings for the participating federal agencies of over \$750,000 between 1999-2001.
- The MIC has performed a difficult task in inventorying and assessing numerous contaminated sites on the island, urging federal agencies to begin cleaning them, and negotiating the different cleanup policies of the federal agencies. However, federal agencies involved in the cleanup would appreciate if the MIC's environmental program had a greater number of technical staff that could assist in guiding the cleanup effort and reviewing technical documentation.

Afterword

As noted earlier, during June 10-11, 2002, a meeting was held between Metlakatla Partnership members to further address some of the remaining issues preventing additional cleanup on the Metlakatla peninsula. Comments provided by one member indicate that the meeting was well attended and participants were able to come to agreement on a process for addressing allocation issues. Parties were asked to identify remaining sites they would cleanup on their own. For those sites not identified for cleanup by a particular party, parties were to then review a matrix to be used to enter into agreements between other parties responsible for contamination at certain sites. Starting August 5, 2002, parties were to actively participate in an allocation process and complete the process as soon as possible. Parties were then to work together to cover their costs for site cleanup subject to the allocation. Finally, following the completion of the allocation parties were to work together to support any share of costs that may be determined by the allocation to be affiliated with past MIC activities. Parties were also expected to jointly fund and cooperate to ensure completion of cleanup at sites subject to the allocation.³⁸

List of Interviewees

Jeff Benson~	Metlakatla Indian Community
Garth Beyette	Federal Aviation Administration
Robert Deering~	U.S. Coast Guard
Frank Esposito~	U.S. Coast Guard
Jere Hayslett	Federal Aviation Administration
Robert Johnson	Army Corps of Engineers
Cliff Mahooty	U.S. Bureau of Indian Affairs
Felicia Wright	U.S. Environmental Protection Agency
Len Richeson	U.S. Department of Defense
Callie Ridolfi~	Ridolfi Engineers

~Denotes that individual participated in a group interview.

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